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Attorneys for Defendant

Attorneys for Plaintiff

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

UNION HOME MORTGAGE CORP.,)

Plaintiff,)

v.)

EMM LOANS, LLC,)

Defendant.)

) Case No.:

) 1:23-cv-21804-KMW-AMD

) Judge Karen M. Williams

JOINT STATUS REPORT AND REQUEST FOR STAY

Pursuant to the Court's July 15, 2024, Text Order (D.I. 27), the parties submit this joint status report. The parties are conducting written discovery and

have not yet noticed or taken depositions in this proceeding, although there have been depositions taken in a related case, *Union Home Mortgage Corp. v. Christopher Fratelli*, Cause No. 1:23-cv-00857 Civ. No. 23-857 (N.D. Ohio) (the “Fratelli case”).

The parties are still working together to resolve various document production issues in this matter. On June 5, 2024, there was a hearing on Plaintiff Union Home Mortgage Corp.’s (“Plaintiff”) motion for preliminary injunction in the Fratelli case. The court in that case ordered post-hearing briefing that will be completed on August 5, 2024.

Because resolution of the preliminary injunction motion will help clarify the parties’ positions here, the parties respectfully request that this Court stay this matter until 45 days after a decision on the preliminary injunction proceeding to facilitate efficiencies.

A proposed form of order is being filed contemporaneously with this status report.

Respectfully submitted,

Dated: July 22, 2024

BARNES & THORNBURG LLP

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CERTIFICATE OF SERVICE

I, Regina S.E. Murphy, hereby certify that on this 22nd day of July 2024, a copy of the foregoing *Joint Status Report* was served on counsel of record via email and the Court's e-filing system as follows:

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